



W. Reed Gusciora
Mayor

CITY OF TRENTON
DEPARTMENT OF LAW

A. Wesley Bridges
Acting Director of Law

April 1, 2021

VIA-E-MAIL AND EFC

The Honorable Douglas E. Arpert
United States District Court of New Jersey
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

RE: Tyshon Edwards v. COT, et al.
Docket No.: 3:20-cv-13552-BRM-DEA

Dear Your Honor:

This office represents the Defendant City of Trenton, (hereinafter "City Defendant") in the above captioned matter. The City Defendant requests a thirty (30) day extension to answer to plaintiff's discovery requests currently due on April 2, 2021. The individual officers, co-defendants join in the City Defendant's request as well. The reason for the City's request is two-fold: first, the Trenton Police Department remains extremely short staffed as a result Covid-19 pandemic. Secondly, there have been several significant departmental changes because of both illness and retirement within Trenton Police Department. As a result, both have significantly hampered the City Defendant's ability fulfill the discovery request. Notwithstanding, the City Defendants are actively working on responses to plaintiff's request and expects to fulfill a significant portion of the request within the thirty (30) day requested extension.

If Your Honor has any questions or concerns, please feel free to contact me. Thank Your Honor for Your assistance in this matter.

Very truly yours,

By:/s/ Rashaan S. Williams
Rashaan S. Williams
ASSISTANT CITY ATTORNEY

cc: **Claudia L. Marchese, Esq.**
Nicholas A. Grieco, Esq.